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Before the
Federal Communication Commission
Washington, D.C. 20554

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In the Matter of

Replacement of Part 90
by Part 88 to Revise
the Private Land Mobile
Radio Services and Modify
the Policies Governing them

PR Docket 92-235

RECEIVED

APR 28 1993

To: The Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

comment deadline prevent us from designing a complete chart, but we would propose that as a first level that areas with a population of 250,000 or less within a 75 mile radius of the transmitter site have authorized power levels of 300 watts ERP. Successive table elements would take into consideration areas of increasing population and antenna height until the more restrictive levels found in the current C-3 chart are reached in areas of high density population.

2. In regards to the General Category Pool and the proposal that all certified frequency coordinators be allowed to assign frequencies from this pool, we also have some reservations. If all coordinators are to be allowed to assign frequencies, a single, common and up-to-date database must be maintained for use by all coordinators. Multiple databases cannot be allowed. Allowing multiple databases to be maintained by various coordinators would cause continuous and harmful interference on the frequencies. The single database must be maintained by the Commission itself or a single designated contractor. The database requirements of this type of system will be quite enormous and the criteria for selecting a possible contractor will have to be

fully defined in order to ensure that the database is kept current, accurate and is

to the new specifications and perform coverage tests during periods that will have a less serious effects on radio systems, businesses, and public safety operations. To perform such tests during the winter months would be difficult technically and could have a serious impact on the safety of property and lives.

Respectfully submitted,

Mack O. Goddard

